

**Remarks**

Claims 14, 16-19 and 21-27 are pending upon entry of the above amendments.

Applicants seek to amend Claims 14 and 19 to add the limitations of dependent Claims 15 and 20, respectively. Accordingly, Applicants seek to cancel Claims 15 and 20. Applicants also seek to amend Claims 24 and 26 to correct an error in the original language -- "device" should be "devices."

Claims 14-27 were rejected under Section 102 as being anticipated by Chiloyan (2002/0083228).

**Claims 14 and 19 – Associating Identification Numbers With The Customer**

Amended Claim 14 requires associating discrete identification numbers for each of a plurality of devices installed in a customer environment with the customer; associating information for configuring a driver for each of the devices installed in the customer environment with the identification number for the device; and storing the identification numbers and associated configuration information together at a location remote from the customer environment and accessible to the customer environment. Amended Claim 19 is a computer medium counterpart to amended Claim 14 and contains similar limitations.

So far as is relevant to the claimed invention, Chiloyan teaches querying a device to obtain a "device descriptor" that includes a "vendor ID and a product ID" used to locate a "network address" in a database that, apparently, associates the vendor ID and/or the product ID with the network address. The appropriate device driver is downloaded from the network address or another address linked to the network address. Chiloyan, paragraphs 0035-0037 and 0041.

Chiloyan does not disclose any association between the device identification numbers and the customer. The Office asserts Chiloyan teaches this limitation at paragraph 0043, lines 1-26. This assertion is not correct. Chiloyan paragraph 0043 teaches accessing "the network address" for advertising materials rather than a driver in the event the appropriate device driver is already installed on the host computer. "The network address" is the same network address used to access the device driver. The same procedure is used for downloading the advertising material and/or downloading a driver – the device is queried for a device descriptor that includes a vendor ID or a product ID used to locate the network address and then

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this network address is accessed to download the advertising material. Nowhere in this process is any association made between any kind of device ID and the customer. Nor is any such association required to complete Chiloyan's download procedure. The host computer simply goes out to "the network address" and downloads a driver or the advertising material (unless the user chooses to suppress the advertising material).

If the Office disagrees with Applicants' analysis of Chiloyan, it is respectfully requested to specifically point out and explain the language in Chiloyan that teaches or even suggests associating discrete identification numbers for each of a plurality of devices with the customer. Absent such a showing, amended Claims 14 and 19 should be allowed.

Claims 16-18 and 21-23 also distinguish patentably over Chiloyan due to their dependence on Claims 14 and 19, respectively.

Further with regard to Claims 17 and 23, Chiloyan does not disclose storing the identification numbers and associated configuration information in a first database and storing the associated device drivers in a second database. In rejecting Claims 17 and 23, the Office asserts only that both items (configuration information and drivers) are stored "in a database on a server" and "on the database server." The Office makes no showing at all that each item is stored in a different database or in a different database on the same server. In fact, Chiloyan does not teach these limitations. For this additional reason, Claims 17 and 23 distinguish over Chiloyan.

Claims 24 and 26 — Associating Group IDs With The Customer

Claim 24 requires associating a group of numbers each identifying a plurality of devices installed in a customer environment with the customer. Claim 26 is a computer medium counterpart to Claim 24 and contains similar limitations. As noted above for amended Claim 14, Chiloyan does not disclose associating device identification numbers with the customer. For this reason alone, Claims 24 and 26 also distinguishes patentably over Chiloyan.

Claim 24 also requires installing a device driver on the plural devices identified by one of the identification numbers. In Chiloyan, by contrast, a single device is queried for vendor or product ID and then, based on that ID, a driver is downloaded for the device. Chiloyan, paragraphs 0035-0037 and 0041. Chiloyan

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does not mention downloading a driver for multiple devices. Even if it is assumed, for purposes of argument only, that a vendor ID or product ID in Chiloyan identifies plural devices in a customer environment, there is no indication at all in Chiloyan that any such ID is used to acquire a driver based on that ID and then install that driver on plural devices. On the contrary, Chiloyan clearly teaches querying a single device when it is installed to obtain the ID and thereafter acquiring and installing the driver for that single device. Chiloyan, paragraph 0036.

For this additional reason, Claims 24 and 26 distinguish patentably over Chiloyan.

Claims 25 and 27 also distinguish over Chiloyan due to their dependence on Claims 24 and 26, respectively.

The foregoing is believed to be a complete response to the outstanding office action.

Respectfully submitted,

By 

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